

1 JOHN A. VOS, ESQ. (#80790)  
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3 For Claimant  
TEAM GOLDEN LINK AMERICA CORPORATION  
4  
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6 UNITED STATES BANKRUPTCY COURT  
7 SOUTHERN DISTRICT OF CALIFORNIA

8 In re: ) No: 05-44481 (RDD)  
DELPHI CORPORATION, ET AL, )  
9 Debtor ) (jointly administered)  
10 )

11 RESPONSE TO OBJECTION TO CLAIM

12 Claimant Team Golden Link America Corporation responds to the  
13 Second Omnibus Objection to its claim #850. Debtor's objection is  
14 based upon the erroneous belief that such claim is duplicative.  
15 Such claims is NOT duplicative.

16 Claimant filed three SEPARATE claims, for three separate  
17 amounts. One claim is for \$91,766.83; one claim is for \$84,709.66;  
18 one claim is for \$175,658.02. Merely because claimant filed three  
19 claims does not mean that any of them are duplicates of each  
20 other. Moreover, on their face each separate claims covered a  
21 DIFFERENT PERIOD OF TIME as set forth on item #2 of such unique  
22 and individual claims. The amounts being different, the period s  
23 of time covered for each claim being different, the only  
24 commonality between the claims is that each was submitted by the  
25 same claimant FOR DISTINCT CLAIMS. Attached to such claims are  
26 invoices supporting each of the separate claims. Similarly  
27 attached to this Response are copies of such invoices, which  
28 includes some of the documents which will be asserted in support

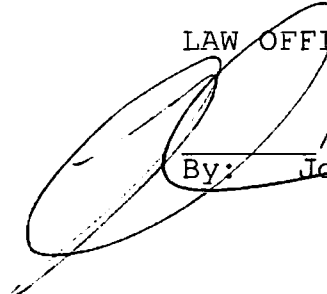
1 of such claims (complete documentation is too voluminous to  
2 attach, and evidentiary proof includes non-documentary physical  
3 items).

4 There is no duplication. The objection is patently  
5 unsupported and should be denied.

6 Dated: November 18, 2006

Respectfully submitted,

LAW OFFICE OF JOHN A VOS

8  
9  /s/  
By: John A. Vos, Esq.

05-44481-rdd Doc 5816 Filed 11/21/06 Entered 11/27/06 08:55:25 Main Document		Pg 3 of 4	<b>PROOF OF CLAIM</b>
<b>United States Bankruptcy Court</b> Name of Debtor: <u>Delphi Corporation et. al.</u>		Case Number: <u>05- 44481 (RDD)</u>	This Space For Court Use Only
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A "request" for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.			
Name of Creditor (The person or other entity to whom the debtor owes money or property): <u>TEAM PACIFIC CORPORATION dba Team Golden Link America</u>		<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.	This Space For Court Use Only
Name and Address where notices should be sent:  <u>Team Golden Link America Corporation</u> <u>1799 Old Bayshore Highway</u> <u>Suite 135 Burlingame CA 94010-1316</u> <u>U.S.A.</u>  *** and: <u>JOHN A. VOS, Esq. (415) 485-5332</u> <u>1430 Lincoln Avenue</u> Telephone Number: <u>San Rafael, CA 94901</u>		<input type="checkbox"/> Check box if you have never received any notices from the bankruptcy court in this case.  <input type="checkbox"/> Check box if the address differs from the address on the envelope sent to you by the court.	
Account or other number by which creditor identifies debtor:		Check here if this claim <input type="checkbox"/> replaces or <input type="checkbox"/> amends a previously filed claim dated:	
<b>1. Basis for Claim</b> <input checked="" type="checkbox"/> Goods sold <input checked="" type="checkbox"/> Services performed <input type="checkbox"/> Money loaned <input type="checkbox"/> Personal injury/wrongful death <input type="checkbox"/> Taxes <input type="checkbox"/> Other _____			
<input type="checkbox"/> Retiree benefits as defined in 11 U.S.C. § 1114(a) <input type="checkbox"/> Wages, salaries, and compensation (fill out below) Last four digits of SS #: _____ Unpaid compensation for services performed from _____ to _____ <div style="text-align: center;">(date) (date)</div>			
<b>2. Date debt was incurred:</b>  <u>25 June 03 - 26 Oct 2005</u>		<b>3. If court judgment, date obtained:</b>	
<b>4. Classification of Claim.</b> Check the appropriate box or boxes that best describe your claim and state the amount of the claim at the time case filed. See reverse side for important explanations.			
<b>Secured Claim.</b> <input type="checkbox"/> Check this box if your claim is secured by collateral (including a right of setoff). Brief Description of Collateral: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other _____ Value of Collateral \$ _____ Amount of arrearage and other charges at time case filed included in secured claim, if any: \$ _____		<b>Unsecured Priority Claim.</b> <input type="checkbox"/> Check this box if you have an unsecured priority claim Amount entitled to priority \$ _____ Specify the priority of the claim: <input type="checkbox"/> Domestic support obligations - 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$10,000)* earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Up to \$2,225* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). <small>* Amounts are subject to adjustment on 4/1/07 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.</small>	
<b>Unsecured Nonpriority Claim s \$84,709.66</b> <input checked="" type="checkbox"/> Check this box if: a) there is no collateral or lien securing your claim, or b) your claim exceeds the value of the property securing it, or if c) none or only part of your claim is entitled to priority.			
<b>5. Total Amount of Claim at Time Case Filed:</b> <u>\$84,709.66</u> <u>-0-</u> <u>-0-</u> <u>\$84,709.66</u> <div style="text-align: center;">(Unsecured)                      (Secured)                      (Priority)                      (Total)</div>			
* If all or part of your claim is secured or entitled to priority, also complete Item 5 or 7 below. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all interest or additional charges.			
<b>6. Credits:</b> The amount of all payments on this claim has been credited and deducted for the purpose of making this proof of claim.		This Space For Court Use Only	
<b>7. Supporting Documents:</b> Attach copies of supporting documents, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, and evidence of perfection of lien. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain. If the documents are voluminous, attach a summary.			
<b>8. Date-Stamped Copy:</b> To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim.			
Date: <u>11/15/05</u>	Sign and print the name and title of any, of the debtor or other person authorized to file this claim (attach copy of power of attorney, if any): <u>ERWIN BORROJA</u>		

Penalty for presenting fraudulent claim: Fine up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571

TEAM PACIFIC CORPORATION				
DELPHI-DELCO OUTSTANDING INVOICES				
AS OF:	OCT 7, 2005			
IN US\$ DOLLAR				
Invoice		Invoice	Outstanding	
Number	Type	Date	\$ Amount	Description / Remarks
D003869	DM-Ntrade	06/25/03	235.30	Sand blaster workholder
D003871	DM-Ntrade	06/18/03	190.20	Brokerage fee - abrasive eqpt.
D003981	DM-Ntrade	8/14/03	16,598.18	Cost of excess invty-ASI 223
D004035	DM-Ntrade	9/30/03	47.17	Customs charges & handling fee
D004061	DM-Ntrade	9/30/03	67.00	Telephone charges
D004231	DM-Ntrade	12/31/03	109.18	Brokerage Fees & Local Charges
D004245	DM-Ntrade	01/22/04	51.61	Brokerage Fees & Local Charges
D004301	DM-Ntrade	01/30/04	14.19	Import Processing Fee-Dec 2003
D004323	DM-Ntrade	02/10/04	108.47	Brokerage Fees & Local Charges
D004327	DM-Ntrade	02/11/04	9.40	Import Processing Fee-Jan 2004
D004368	DM-Ntrade	02/27/04	54.08	Brokerage Fees & Local Charges
D004408	DM-Ntrade	03/24/04	23.34	Import Processing Fee-Feb 2004
D004463	DM-Ntrade	04/20/04	75.32	Import Processing Fee-Mar 2004
D004578	DM-Ntrade	06/09/04	214.83	Brokerage Fees & Local Charges
D005655	DM-Ntrade	10/26/05	66,911.49	Cost of buy-back materials due to end of life of ASI120
TOTAL OTHER CHARGES - (Non-Trade)			\$ 84,709.66	